

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 99-271**

**Respondent:** Gloria Harrington

**Title:** Manager

**REQUEST:** Department of Telecommunications and Energy, Record Requests

**DATED:** August 14, 2000

**ITEM:** DTE RR-318 Please compare the documents, specific to overlashing, attached to the responses to Information Request DTE-ATT 4-18 (Appendix VI) and Information Request DTE-NECTA 4-8 (Attachment 2, dated May 30,2000). Did Verizon-MA include any of the proposed changes offered by the licensees in the NECTA 4-8? If not, why not?

**REPLY:** Verizon-MA did not accept any of the red-lined changes (nor any of the changes that were made but not identified in red-line form) that were offered by the licensees and reflected in Attachment 2 dated May 30, 2000 to the response to Information Request DTE-NECTA 4-8. Principally, the proposed changes were deletions dealing with post-construction notification and inspection requirements and associated charges. (Attachment I to this response reflects the red-lined changes offered by licensees as well as those changes made but not identified in red-line form.)

The provisions in the overlash attachment to the license agreement are intended to permit Verizon-MA to perform a limited post-construction sampling of poles involved in an overlash project to determine whether there are significant instances of non-compliance with specifications and requirements for overlash. These limited post-construction inspections, as reflected in response to Information Request DTE-ATT 4-18 (and as presented to licensee workshop participants in March and not challenged by them until June) are necessary to ensure overlashing construction quality and, as such, should not be completely eliminated. Verizon-MA's position on overlashing as it relates to post-construction inspections is addressed in paragraphs 72 through 74 of the Supplemental Checklist affidavit dated August 4, 2000. This position was also explained during

**REPLY:** DTE RR-318 Technical Sessions before the Department on August 14, 2000 (cont'd) (transcript Volume 20, pages 4107-4124) and in Verizon-MA's responses to information requests DTE-NECTA 4-7(c) and DTE-NECTA 4-9.

Verizon-MA, however, remains open to some reasonable level of modification to the standards (*e.g.*, the number of construction deviations found) and the application of charges associated with these post-construction inspections for overlashing. As such, Verizon-MA would be willing to modify the overlash document attached to DTE-ATT 4-18 (Appendix VI) to ensure that costs for post-construction inspections are the responsibility of licensees only to the extent that an inspection finds pole attachments to be in non-compliance. Accordingly, the new red-lined version of Appendix VI to the license agreement (Attachment II to this response) eliminates the sampling provisions for post-construction inspections included in Section 5(g). Verizon may inspect as much of the overlash project as it wishes, but the licensee is not required to pay for the inspection of poles found to be in compliance.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 99-271**

**Respondent:** Gloria Harrington

**Title:** Manager

**REQUEST:** Department of Telecommunications and Energy, Record Requests

**DATED:** August 14, 2000

**ITEM:** DTE RR-319 Please provide any documentation supporting Verizon's position that the Mayor of the city of Quincy requested that no utility poles located in the city be further "boxed".

**REPLY:** No minutes were prepared with respect to the meeting between representatives of Verizon-MA and the Mayor of Quincy. Accordingly, Verizon-MA has no responsive documents.

NET RR# 136